

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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THE TRUSTEES OF THE STEVENS INSTITUTE  
OF TECHNOLOGY,

Plaintiff,

-VS-

IMODALGROUND, L.L.C., INTER-MODAL  
HOLDING, L.L.C., JOHN DOES 1-10, and ABC  
COMPANIES 1-10,

Defendants.

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: Docket No.: 2:22-cv-4411 (JXN) (JBC)  
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: Civil Action  
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: **CONSENT JUDGMENT**  
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**THIS MATTER**, having been brought before the Court upon the filing of a complaint by Plaintiff The Trustees of the Stevens Institute of Technology (“Stevens”) against Defendants iModalGround, LLC and Inter-Modal Holdings, LLC (collectively, “iModal Defendants”) in connection with a Corporate Sponsored Research Agreement, effective October 1, 2020, and a Corporate Sponsored Research Agreement-Modification 01, dated November 11, 2021, between the parties (“Lawsuit”); and

**WHEREAS**, Stevens and the iModal Defendants respectfully stipulate and agree to the entry of this Consent Judgment as follows:

1. This Court has jurisdiction over the parties and the subject matter pursuant to 28 U.S.C. §1332.
2. The parties have conferred and come to the resolution of the Lawsuit, and have entered into a Settlement Agreement, negotiated in good faith, dated September 20, 2023.
3. The parties waive the entry of findings of facts and conclusions of law under Rules 52 and 65 of the Federal Rules of Civil Procedure.
4. The parties understand and agree that the Consent Judgment will constitute a final judgment of this matter.

5. The parties understand and agree to waive right to appeal from this Consent Judgment.
6. The parties further understand and agree that the Court will retain jurisdiction over this matter for the purpose of enforcing the Consent Judgment.

**It is ORDERED, ADJUDGED, and DECREED** that:

1. Judgment is entered in favor of Stevens and against the iModal Defendants, jointly and severally, in the amount of Three Million Three Hundred Thousand U.S. Dollars (\$3,300,000.00) on all claims, less any payment received.
2. This is a final judgment as to all claims set out in the Complaint in the Lawsuit by any party against any other party, and fully and finally terminates the Lawsuit with prejudice.
3. The parties shall bear their own costs of the Lawsuit, and all rights of appeal are waived.
4. This Court retains exclusive jurisdiction of this action for the purpose of ensuring compliance with the Judgment.

Dated: \_\_\_\_\_, 2023

\_\_\_\_\_  
Hon.  
United States

The parties hereby stipulate and agree to entry of the foregoing consent judgment as a final judgment in this action.

**The Trustees of the Stevens Institute of Technology**  
By its attorneys,

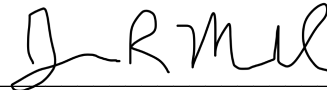


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**iModalGround, LLC**

**and**

**Inter-Modal Holding, LLC**  
By its attorneys,



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